



Attorneys at Law

**L'Abbate, Balkan, Colavita & Contini, L.L.P.**

3 Huntington Quadrangle, Suite 102S, Melville, New York 11747

T.516.294.8844 F.516.294.8202

[www.lbcclaw.com](http://www.lbcclaw.com)

James D. Spithogiannis

Partner

[jspithogiannis@lbcclaw.com](mailto:jspithogiannis@lbcclaw.com)

Direct Dial: (516) 837-7464

March 5, 2025

**VIA ECF**

Hon. Nusrat J. Choudhury  
United States District Court  
Eastern District of New York  
100 Federal Plaza, Courtroom 1020  
Central Islip, New York 11722

Re: *Deo, et al. v. Baron, et al.*  
Case No. 2:24-cv-06903 (NJC) (JMW)

Dear Judge Choudhury:

L'Abbate, Balkan, Colavita & Contini, L.L.P., has been retained to represent Defendant Milman Labuda Law Group PLLC ("Milman") in the above-captioned matter. Enclosed is a Consent Substitution of Counsel Form signed by the undersigned and Milman (outgoing counsel/our client), as well as a Declaration in Support.

Our substitution into the case will not delay or impact any of the pending court-imposed deadlines. However, Milman consents to and joins in the portion of an application by certain Defendants in this action to hold in abeyance, or otherwise stay, the briefing schedule ordered by the Court concerning Defendants' anticipated motions to dismiss. Dkt. No. 69.

We respectfully request that the Court "so order" the substitution. Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink that reads "James D. Spithogiannis".

James D. Spithogiannis

JDS/ELM/aml  
Enc.